

Debtor 1 Mark Guy Jeune

Debtor 2 Jolene Marie Jeune  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN District of Pennsylvania  
(State)

Case number 19-23512-JAD

## Form 4100R

# Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

Name of creditor: Planet Home Lending, LLC Court claim no. (if known): 28

Last 4 digits of any number you use to identify the debtor's account: 2215 \_\_\_\_\_

Property address: 5511 Century Avenue  
Number Street

Pittsburgh, Pennsylvania 15207  
City State ZIP Code

### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

### Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 1 / 1 / 2025  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 Mark Guy Jeune  
First Name Middle Name Last Name

Case number (if known) 19-23512-JAD

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☐ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Andrew M. Lubin 11/15/2024  
Signature Date

Print Andrew M. Lubin Attorney for creditor  
First Name Middle Name Last Name Title

Company McCabe, Weisberg & Conway, LLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 1420 Walnut Street, Suite 1501  
Number Street  
Philadelphia, PA 19102  
City State ZIP Code

Contact phone (215) 790 - 1010 Email ecfmail@mwc-law.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: Mark Guy Jeune and Jolene Marie  
Jeune

Debtors

Planet Home Lending, LLC, or its Successor or  
Assignee

Movant

vs.

Ronda J. Winnecour  
Mark Guy Jeune and Jolene Marie Jeune  
Respondents

Chapter 13

Bankruptcy No. 19-23512-JAD

**CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE  
PAYMENT**

I, Andrew M. Lubin, attorney for Planet Home Lending, LLC, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: 11/15/24

Mark Guy Jeune  
5511 Century Ave  
Pittsburgh, Pennsylvania  
15207

Jolene Marie Jeune  
5511 Century Ave  
Pittsburgh, Pennsylvania  
15207

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15219  
Trustee

Aurelius P. Robleto  
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Attorney for Debtors

/s/ Andrew M. Lubin

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ANDREW M. LUBIN, ESQUIRE ID # 54297  
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